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Proposed Attorneys for Eagle Recycling Systems, Inc.
and Lieze Associates, d/b/a Eagle Recycling of NJ

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

EAGLE RECYCLING SYSTEMS, INC. et al.,¹

Debtors and Debtors-in-Possession.

Chapter 11

(Joint Administration Pending)

Case Nos. 13-18412 and 13-18413

**NOTICE OF MOTION FOR AN ORDER DIRECTING THE
JOINT ADMINISTRATION OF THE DEBTORS' CHAPTER
11 CASES PURSUANT TO FED.R.BANKR.P. 1015(B) AND
GRANTING OTHER RELATED RELIEF**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that, pursuant to an Order Regarding Application for Expedited Consideration of First Day Matters, the undersigned, Saiber LLC, proposed attorneys for Eagle Recycling Systems, Inc. and Lieze Associates, Inc., d/b/a Eagle Recycling of NJ, the above-captioned debtors and debtors-in-possession (collectively, the "Debtors"), will move before the assigned United States Bankruptcy Judge at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, for an Order directing the joint administration of the Debtors' Chapter 11 cases pursuant to *Fed. R. Bankr. P.* 1015(b) (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the Debtor will rely upon the Declaration of Jeffrey Marangi in Support of Debtors' Chapter 11 Petitions and

¹The proposed jointly administered Chapter 11 Debtor is Lieze Associates, Inc., d/b/a Eagle Recycling of NJ.

First Day Motions and the accompanying Application, which sets forth the relevant factual and legal basis upon which the relief requested should be granted. A proposed form of Order is also being submitted with this Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion shall be presented in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters, a copy of which is also being served with this Motion, or will be served as soon as possible upon its entry by the Court.

PLEASE TAKE FURTHER NOTICE that unless objections are timely made, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1 (a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel requests oral argument on the return date of the Motion if objections are timely presented.

SAIBER LLC

Proposed Attorneys for Eagle Recycling
Systems, Inc. and Lieze Associates, d/b/a
Eagle Recycling of NJ, Debtors-in-Possession

By: /s/ Vincent F. Papalia
VINCENT F. PAPALIA

Dated: April 19, 2013